

Multiple Signatory Letter 33

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WD0111

From: Dave Pinick [REDACTED]
Sent: Sunday, July 27, 2008 3:54 PM
To: NBAFProgramManager
Subject: National Bio and Agro-Defense Facility Environmental Impact Statement

NBAF Program Manager,

1| 23.0 | We are very concerned about the ongoing operations of this facility. The location should be as isolated
 2| 21.4 | as possible because there are far too many things that can happen over time. I have pasted below an editorial letter published in the Topeka Capital-Journal on Sunday, July 27, 2008 that expresses our concerns very well.

Thank you for your time,
 Dave and Marie Pinick
 [REDACTED] Ks

Letter: NBAF too risky

The Capital-Journal
 Published Sunday, July 27, 2008

I am writing this letter to express my strong opposition to the location of the National Bio- and Agro-Defense Facility at Manhattan. Everyone agrees that research and countermeasures on foreign animal disease are vitally important. With the potential of a release, however, there are many reasons why the facility shouldn't be located here in the center of the United States, in the heart of livestock country.

One of the diseases to be studied at NBAF is foot and mouth disease. In the U.K., an outbreak of the disease in 2001 resulted in more than \$10 billion in losses to tourism and the agriculture sector and the slaughter of more than 4 million animals. Another outbreak occurred in England in 2007, which was apparently caused by a drainage leak from a research facility.

Estimates of direct costs of a similar outbreak in the U.S. run as high as \$24 billion, with the destruction of about 13 million animals. The USDA estimates that a foot and mouth outbreak could spread to 25 states in as little as five days.

Advocates of locating NBAF in Manhattan will tell you how safe this will be. As we are all aware from the June 11 tornado, acts of God do the unimaginable. Will this site be built to withstand an EF5 tornado similar to the one that destroyed Greensburg?

How do we account for every scenario dealing with the potential of accidental or deliberate human release of pathogens? The worst-case scenarios, while improbable, are a reality of life. They said the Titanic was unsinkable.

Comment No: 1 Issue Code: 23.0

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative based on safety concerns. The NBAF would be designed and constructed using modern biocontainment technologies, and operated by trained staff and security personnel to ensure the maximum level of worker and public safety and least risk to the environment in accordance with all applicable federal, state, and local laws and regulations.

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. The risk of an accidental release of a pathogen from the NBAF is extremely low. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and health consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. A separate Threat and Risk Assessment (TRA) (designated at "For Official Use Only") was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and would be used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-biocontainment pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

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What we stand to gain as individuals, as a community or as a state shouldn't be leveraged in light of what we risk.

This facility should be built, but it should be built on Plum Island, N.Y., which has infrastructure already in place and affords more protection to animals and humans due to its location.

Farmers and ranchers concerned about this potential threat to their livelihood should make their opinions heard on Thursday at the K-State Union when the Department of Homeland Security will hold public hearings from 12:30 to 4:30 p.m. and from 6 to 10 p.m. Those unable to attend these meetings can comment online at www.dhs.gov/nbaf (click on public involvement).

PAUL B. IRVINE, [REDACTED]

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COUNTY OF DURHAM
BOARD OF COMMISSIONERS

Ellen W. Reckhow
 Chairman
 11 Pine Top Place
 Durham, NC 27705
 Email: ereckhow@aol.com

Becky M. Heron
 Vice-Chairman
 4425 Kerley Road
 Durham, NC 27705
 Email: bmheron@co.durham.nc.us

August 18, 2008

Mr. James V. Johnson
 U.S. Department of Homeland Security
 Science and Technology Directorate
 Mail Stop 2100
 245 Murray Lane SW
 Building 410
 Washington, DC 20528

Dear Mr. Johnson:

1| 25.3 The Durham County Board of Commissioners voted on Monday, August 11, 2008 (4 to 1 with Commissioner Lewis Cheek dissenting) to oppose the consideration and location of a site in Butner, North Carolina for a National Bio and Agro-Defense Facility. The County's opposition to the site was based upon findings from the Durham Environmental Affairs Board, the Durham County Public Health Department and the Durham County Office of Emergency Management after an extensive review of the Draft Environmental Impact Statement, which was completed by your department in June.

This issue is of critical importance to the citizens and environment of Durham, as well as to all of our neighbors in surrounding areas. After much analysis, research and discussion, the Durham County Board of Commissioners has serious concerns related to the environmental impacts of locating this facility at the Umstead Research Farm in Butner, North Carolina. The major areas of concern are:

- 2| 18.3, 12.3, 9.3, 21.3 1. Incineration/waste management; water use; air quality; potential for release of pathogens;
- 3| 2.0 2. A general lack of information specific to the site, facility design, and intended operations that impedes conclusions about impacts and risks for the Umstead site;
3. Lack of substantial assurances about long-term commitments to safe maintenance of the facility and mission fidelity;
- cont. 2| 21.3 4. The potential for the entry and subsequent escape of infected mosquito vectors from the facility;

Durham County Administrative Complex, 200 E. Main Street, Durham, N.C. 27701 (919) 560-0027 Fax (919) 560-0013
 Equal Employment/Affirmative Action Employer Website: <http://www.co.durham.nc.us/>

MD0129

Lewis A. Cheek
 5105 Copper Ridge Drive, #308
 Durham, NC 27707
 Email: lcheek@co.durham.nc.us

Philip R. Cousin Jr.
 509 Wellingham Drive
 Durham, NC 27713-7501
 Email: precousin@earthlink.net

Michael D. Page
 702 Basil Drive
 Durham, NC 27713
 Email: mpage@co.durham.nc.us

Comment No: 1 Issue Code: 25.3

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 18.3

DHS notes the commentor's concern regarding incineration and waste management. DHS notes the commentors' concern regarding incineration and waste management. Section 3.13.2.2 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). The final design for the NBAF would probably include more than one technology for the treatment of these wastes. Factors that may be considered in making this technology decision include individual site requirements and restrictions, air emissions, liquid and solid waste stream by-products, and operation and maintenance requirements. Because the method of carcass and pathological waste disposal has not yet been determined, Section 3.4 assumes that the treatment technology with the greatest potential to negatively impact air quality, incineration, will be used to assess the maximum adverse effect. Similarly, because alkaline hydrolysis would have the greatest impact on sanitary sewage capacity, Section 3.3 assumes that alkaline hydrolysis (performed in a tissue digester) would be used to assess the maximum sanitary sewage impacts.

Any technology used to dispose of carcasses and pathological waste would have to be built and operated in accordance with federal, state and local regulations, as well as permit requirements. These regulations and permit requirements would specify emissions limits, monitoring, and reporting requirements as appropriate. The public would have an opportunity to review and comment on proposed emissions limits, and monitoring requirements as part of the permitting process.

Comment No: 2 Issue Code: 12.3

DHS notes the commentor's water quality concerns and DHS acknowledges the current regional drought conditions. As described in Section 3.7.7.3.1 of the NBAF EIS, the South Granville Water and Sewer Authority has 3 to 4 million gallons per day of excess potable water capacity and could meet NBAF's need of approximately 110,000 gallons per day, currently less than 0.4% of the Authority's total current capacity. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 210 residential homes. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Section 3.13.8 describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 2 Issue Code: 9.3

DHS notes the commentor's concern for air quality. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the Umstead Research Farm Site are discussed in Section 3.4.7. Air pollutant concentrations were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design would ensure that the NBAF does not significantly affect the region's ability to meet air quality standards.

Comment No: 2 Issue Code: 21.3

DHS notes the commentor's views on risk. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen.

Comment No: 3 Issue Code: 2.0

DHS notes the commentor's concerns. Should the decision be made to build the NBAF, the NBAF would be designed and operated taking into consideration site-specific factors to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment.

The U.S. Congress and the President are responsible for determining funding priorities for government programs. DHS would maintain the NBAF and ancillary facilities in compliance with applicable environmental, safety, and health requirements and provide for safe operation and maintenance.

Section 7524 of the Food, Conservation and Energy Act of 2008 (Farm Bill) directs the Secretary of Agriculture to issue a permit to the Secretary of Homeland Security for work on live virus foot and mouth disease at any facility that is the successor to the Plum Island Animal Disease Center. There are no limitations as to where in the United States the facility can be built.

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Mr. James V. Johnson
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August 18, 2008

- cont. | 2 | 21.3
5. The adequacy of safety barriers and safety controls and procedural controls to ensure that no accidents will occur; and
 6. The consequences to livestock in the event of the release of foot and mouth disease or other large animal diseases;

The Draft Environmental Impact Statement also failed to respond to many of the questions that we have about the location of the facility on the site. For example:

- cont. | 3 | 2.0
1. Why are diseases proposed to be studied at the facility that is not currently allowed by federal law to be studied on the U.S. mainland?
- 4 | 20.3
2. What is the plan to ensure the safety of confined populations in the event of pathogen releases and disease outbreaks?
- cont. | 2 | 21.3
3. What is the plan to support and manage the surge at local medical facilities from a disease outbreak brought about by a mosquito-borne virus?
- 5 | 19.3
4. Who will provide fire, EMS, rescue, and hazardous materials support for the facility to the Butner Public Safety Department?
- 6 | 8.3
5. Who will pay for the cost of the required infrastructure and traffic improvements necessary for the construction and operation of the facility?

I have attached a companion report from the Durham Environmental Affairs Board discussing eleven specific concerns, why they are important to Durham, how they are inadequately addressed in the Draft Environmental Impact Statement, and what information would be required in order to make a scientifically-defensible judgment of the environmental impact of this facility, if it is located at the Umstead Research Farm. I have also attached a copy of a GAO Report dated May 22, 2008, which was the source for Question #1 and is a significant concern for us.

We thank you in advance for your consideration of our position. If, however, you have any further questions, please do not hesitate to contact our County Manager, Mr. Mike Ruffin at (919) 560-0001.

Sincerely,



Ellen W. Reckhow
Chairman

Comment No: 4 Issue Code: 20.3

DHS notes the commentors' concerns regarding safeguarding the confined populations. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. As noted in response to Comments No. 2, site-specific protocols would be developed, in coordination with local emergency response agencies, which would address special consideration populations residing within the local area.

Comment No: 5 Issue Code: 19.3

DHS would offer coordination and training to local medical personnel regarding the effects of pathogens to be studied at the NBAF. Further, emergency management plans would also include training for local law enforcement, health care, and fire and rescue personnel.

Comment No: 6 Issue Code: 8.3

DHS notes the commentor's concern regarding the infrastructure improvements required for the NBAF operation at the Umstead Research Farm Site. Sections 3.3.7 and 3.11.7 of the NBAF EIS include an assessment of the current utility and transportation infrastructure, the potential impact and effects from construction and operation of the NBAF, and the planned utility and transportation improvements to meet the operational requirements of the NBAF. Funding for the design, construction, and operation of the NBAF would come from the federal government. Proposals for offsets to the site infrastructure (part of the construction costs) were requested by DHS. The decision as to what to offer (land donation, funding, other assets) is solely at the discretion of the consortium, state and local officials as part of the consortium bid site package. The amount of funding and how the funding is paid for (bonds, taxes, etc) is determined by the state and local government officials and is not the decision of the federal government.

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Mr. James V. Johnson
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August 18, 2008

xc: Board of County Commissioners
Durham Environmental Affairs Board
Chuck Kitchen, County Attorney
Carolyn Titus, Deputy County Manager
Deborah Craig-Ray, Assistant County Manager
Brian Letourneau, Public Health Director
Jeff Batten, Fire Marshall
Steve Medlin, City/County Planning Director
Mike Wilkins, Senior Vice President
Dr. Warwick Arden, Dean College of Veterinary Medicine
The Honorable Floyd B. McKissick, Jr., NC State Senator
The Honorable Bob Atwater, NC State Senator
The Honorable W. A. (Winkie) Wilkins, NC State Representative
The Honorable Paul Luebke, NC State Representative
The Honorable Henry M. Michaux, Jr., NC State Representative
The Honorable Larry D. Hall, NC State Representative

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WD0225

From: Linda and Dennis Rice [REDACTED]
Sent: Sunday, August 10, 2008 3:33 PM
To: NBAFProgramManager
Cc: Linda Rice home
Subject: Manhattan Kansas location

- 1|25.4 | As long time residents here, my husband Dennis and I are against the NBAF being located in Manhattan.
The rest of our lives, we will be concerned of an emergency that would cause something dangerous to be
2|21.4 | released - affecting livestock, other animals and even humans. Also, we have a concern of a "mad"
scientist, who might cause problems, too. In the recent news, was the information about the man who
released the Anthrax (he committed suicide). We realize that it would be an economic boon to the area,
but at what risk? Thanks, Linda and Dennis Rice; [REDACTED] KS [REDACTED].

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 21.4

DHS notes the commentors' concerns regarding risks associated with NBAF operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS present the analyses of a variety of accidents that could occur and the potential consequences. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low.

As discussed in Section 3.14.3.4, employees and contractors would be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6, would be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

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MD0001

Congress of the United States
Washington, DC 20515

July 14, 2008

Admiral Jay Cohen
Undersecretary for Science & Technology
U.S. Department of Homeland Security
Washington, D.C. 20528

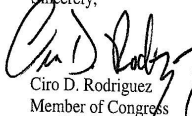
Dear Admiral Cohen:

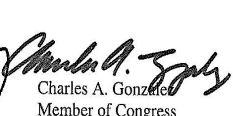
As you continue to evaluate potential sites for the new National Bio and Agro-Defense Facility (NBAF), we want to strongly convey our support for locating this facility at the Texas Biological and Agro-Defense Consortium site in San Antonio, Texas.

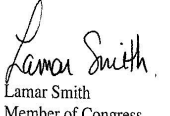
Additionally, we would like to arrange an opportunity for Members of the Texas delegation to discuss with you recent developments in the NBAF selection process and further explain how the San Antonio community supports the NBAF selection.

We thank you in advance for your consideration of this request, and we look forward to your prompt response. Please don't hesitate to contact any one of us should you have any questions or would like any additional information.

Sincerely,


Ciro D. Rodriguez
Member of Congress


Charles A. Gonzalez
Member of Congress


Lamar Smith
Member of Congress

PRINTED ON RECYCLED PAPER

Comment No: 1

Issue Code: 24.6

DHS notes the Congressmen's support for the Texas Research Park Site Alternative.

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08/21/2008 13:59 3085326200 BROUILLETTE LAW OFF PAGE 01/02

McPherson County Commissioners
P.O. Box 122, Tryon Nebraska, 69167

FD0034

FAX TRANSMISSION

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To: NBAF Draft Environmental Impact Statement Date: August 21, 2008
Fax #: 1.866.508.6223 Pages: 2 including this cover sheet
From: McPherson County Commissioners
Subject:
Comments:
Originals: ☒ not sent
sent (by U.S. mail/hand delivered)

If you have any problems receiving this fax, please notify Sandy at (308) 532-1600.

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FD0034

McPherson County Commissioners
P.O. Box 122, Tryon Nebraska, 69167

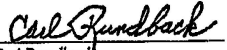
August 13, 2008

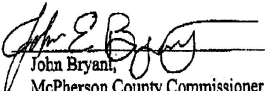
TO WHOM IT MAY CONCERN:

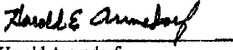
1| 27.0 The McPherson County Commissioners are opposed to the implementation of a National Animal Identification System (NAIS). They do not believe such a system is in the best interests of the citizens of McPherson County, Nebraska. As you know, McPherson County is a rural community with cattle as it's main source of industry. Such a system would cause an undue burden on the cattle ranchers in McPherson County and is a step in the wrong direction in an already over-rated industry.

2| 5.0 It is also our understanding that there is a proposal to move the Plum Island, New York, Bio-Level 4 Research Lab to the Mid-West. The McPherson County Commissioners are also opposed to moving the Plum Island, New York; Bio-Level 4 Research Lab to the Mid-west. The Commissioners believe that this another advance which will ultimately have a negative impact on the ranching community.

If you have any questions about our opposition, feel free to contact us.


Carl Rundback,
McPherson County Commissioner


John Bryant,
McPherson County Commissioner


Harold Arensdorf,
McPherson County Commissioner

Comment No: 1 Issue Code: 27.0

DHS notes the commentor's statement; however, it is not within the scope of the NBAF EIS, which evaluates the environmental impact of the no action alternative and the alternatives for constructing and operating the NBAF.

Comment No: 2 Issue Code: 5.0

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

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WD0812

From: Charles Sapp [REDACTED]
Sent: Monday, August 25, 2008 5:40 PM
To: NBAFProgramManager
Subject: NO to NBAF

1|5.2 | NO to NBAF in Athens!

Susan Tyler
Charles Sapp

Comment No: 1

Issue Code: 5.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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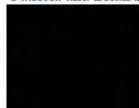
Page 1 of 1

WD0243

From: [REDACTED]
Sent: Wednesday, August 13, 2008 9:17 AM
To: NBAFProgramManager
Subject: Plum Island

1|25.1 | As residents of [REDACTED] CT we feel very strongly that we do not want this change to plum island to occur in our community.

Patricia and Brian Selfors



It's time to go back to school! Get the latest trends and gadgets that make the grade on [AOL Shopping](#).

Comment No: 1 Issue Code: 25.1
DHS notes the commentor's opposition to the Plum Island Site Alternative.

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SELMYN

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FD0013

**U.S. Dept. of Homeland Security
Science and Technology Directorate****August 13th, 2008**

We live in [REDACTED] NY, just opposite the Plum Island ferry terminal. We bought a home here, in order to spend our retirement, our "Golden Years", somewhere serene, beautiful, healthy and safe. Now we find that our investment is going to be considered as a place to further the toxic experimentation already there. The population here, is generally made up of those, like us, who settled here with the belief and trust, that our government would not place us in danger.

Three Mile Island had its detractors, but were assured "nothing could happen here..!"and look what happened. Chernobyl was another example of what can happen.....and there are NO guarantees.

Those of us living here deserve better from our government...!!

Marianne and Michael Selwyn
[REDACTED]

Comment No: 1

Issue Code: 15.1

DHS notes the commentors' opposition to the Plum Island Site Alternative. Section 3.10.6 of the NBAF EIS presents the conclusion that there would be no expected adverse effect on property values. The housing market would be able to meet the increase in housing demand, and it is possible that with the relocation of highly skilled workers to the immediate area, property values could increase due to an increase in demand. There is no empirical evidence that a facility such as the NBAF would reduce property values in the study area. Therefore, the overall effect of the NBAF on housing market conditions would be negligible.

Comment No: 2

Issue Code: 19.1

DHS notes the commentors' concerns regarding dangers associated with NBAF operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS present the analyses of a variety of accidents that could occur and the potential consequences. DHS cannot guarantee that the NBAF would never experience an accident; however, the risk of an accidental release of a pathogen from the NBAF is extremely low. In fact, the Plum Island Site has a lower potential impact in case of a release due both to the water barrier around the island and the lack of livestock and susceptible wildlife species.

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SELWYN

PAGE 01

FD0013

AUGUST 13, 2008

TO U.S. Dept. Homeland Security
Science/Technology Directorate
[REDACTED]

FROM Marianne/Michael SELWYN
[REDACTED]

RE Plum Island facility

2 pages
incl. Cover

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WD0811

From: Sherwin, Brie [brie.sherwin@ttu.edu]
Sent: Monday, August 25, 2008 5:40 PM
To: nbafprogrammanager@dhs.gov
Subject: EIS Comments
Attachments: NBAF letter.pdf

Attached please find EIS Comments submitted by the Texas Tech University Center for Biodefense, Law & Public Policy.

Thank you.

Brie Sherwin
Assistant Director, Center for Biodefense, Law & Public Policy
Texas Tech University School of Law
1802 Hartford Avenue
Lubbock, Texas 79409-004
806.742.3990 x319

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WD0811

August 25, 2008

U.S. Department of Homeland Security
Science and Technology Directorate
James V. Johnson
Mail Stop #2100
245 Murray Lane, SW, Building 410
Washington, DC 20528

To Whom It May Concern:

In accordance with the National Environmental Policy Act (NEPA), the Center for Biodefense, Law and Public Policy, Texas Tech University, offers the following comments regarding the proposed National Bio and Agro-Defense Facility (NBAF).

The Center for Biodefense, Law and Public Policy, was established in 2002 at the Texas Tech University School of Law, as a multidisciplinary effort by Texas Tech University to perform research addressing public policy and legal issues in biodefense. Since its inception, the Center for Biodefense, Law and Public Policy's budget has been doubled through grants and other means of support while increasing the Center's significance in the biodefense arena through the addition of a Law and Biodefense Certificate program for law students and further by performing support work for agencies and organizations such as the National Institute of Health (NIH).

1| 1.0 The Center for Biodefense, Law and Public Policy supports the U.S. plan to build a National Bio and Agro Defense Facility. The economic importance of the agricultural sector in the U.S. and its importance to homeland security makes it imperative to establish adequate research and response capacity against potential threats, both intentional and naturally emerging ones. It is clear that a research facility devoted to the development of potential bioterrorism countermeasures and the study of biological threats as a result of zoonotic diseases could vastly improve the United States defense capabilities against a terrorist attack with biological roots. Further, upon review of the six potential alternative locations and a detailed look at the Draft Environmental Impact Statement (DEIS) the Texas Tech Center for Biodefense, Law and Public Policy offer the following comments.

The DEIS evaluates the possible negative impact by the proposed action on *existing* natural and human environment, as well as the *potential* impacts on human health and the environment that could result from the construction and operation of the NBAF in one of the six alternative locations. The DEIS evaluation of Potential Adverse Effects for Normal Operations shows minimal differences between the six proposed locations, and no differences in Potential Beneficial Effects for Normal Operations (NBAF DEIS Executive Summary, Table ES-3, and DEIS 3-511).

The DEIS further states that "[n]o significant effects to environmental or human resources would be expected from any of the alternatives." (NBAF DEIS Executive Summary, ES-10 and DEIS 3-510). However, there would be "[s]ignificant beneficial effects to biological resources (wildlife), economies, and health and safety [that] could occur with the development of new

Comment No: 1

Issue Code: 1.0

DHS notes the commentor's support for the NBAF and its research mission. DHS's mission is to study foreign animal and zoonotic (transmitted from animals to humans) diseases that threaten our agricultural livestock and agricultural economy. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States.

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2| 4.0 vaccines, diagnostic procedures, or rapid responses to potential FAD outbreaks." (NBAF DEIS Executive Summary, Table ES-3, and DEIS 3-510). Significant Beneficial Effects are defined as "action[s] that would greatly improve current conditions." (NBAF DEIS Executive Summary, Table ES-3, and DEIS 3-511). In short, the potential for development of life saving vaccine countermeasures at the facility, along with the possibility of decreasing response time through necessary research and development must be placed at the forefront of all impact analysis.

3| 19.0 While the DEIS analyses in more or less detail the beneficial effects of NBAF on biological resources and the socioeconomics of the proposed alternative sites, DEIS Section 3.14 lacks a detailed analysis of the Health and Safety beneficial effects mentioned in DEIS 3-510. The Health and Safety Analysis in Section 3.14 describes the different adverse effects of resulting from accident or intentional release of the FMD, Nipah, or Hendra viruses at each proposed site. However, it fails to explain how the likelihood of success in the development of new vaccines, the design and deployment of new diagnostic procedures, or the response to potential outbreaks would be affected by the location of the NBAF in each of the possible alternative sites. In order for a thorough and complete EIS to be reviewed it is our opinion that this issue must be addressed and included in any subsequent reports.

4| 15.6
5| 8.6 Among the sites considered, it should be noted that the San Antonio region has a unique resource to any of the other sites. As part of ongoing bioterrorism preparedness efforts, San Antonio hosted the Pale Horse AMMEDEX 2002 biodefense exercise to "explore, at the local level, the challenges and complexities that medical practitioners, facilities, and agencies in the public, private, and military sector will face when confronted with a covert terrorist attack that results in a major public health emergency." AMMEDEX had the distinction of being the first national bioterrorism exercise to include a civilian law component, which provided opportunities to interact with military lawyers where a civilian-military community exists and for other scenarios where both sectors must work together. This civilian law component was led by the Texas Tech University, Center for Biodefense, Law and Public Policy, Director, Victoria Sutton.

6| 15.0 In conclusion, upon review of the DEIS several points stood out as significant. First, it appears from analyzing the tables included within the DEIS (ES-11) that the difference between the six alternatives sites impact on the Environment is negligible. More information on the distinctions between the sites is needed, including the differences in the proximity to densely populated areas. Because none of the existing alternative sites contain negative impacts over the moderate level, it is even more critical to adequately develop the worst-case scenarios for each site, and it is our opinion that this part of the report, Appendix D, should be more thoroughly developed for each site.

7| 21.0 Sincerely,

Dr. Victoria Sutton, MPA, PhD, J.D., Director, Center for Biodefense, Law & Public Policy
Brie Sherwin, M.S., J.D., Assistant Director, Center for Biodefense, Law & Public Policy
Jaume Canaves, Fellow, Center for Biodefense, Law & Public Policy
Chris Gardner, J.D., Fellow, Center for Biodefense, Law & Public Policy

Comment No: 2 Issue Code: 4.0

DHS notes the commentor's statement. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States.

Comment No: 3 Issue Code: 19.0

As described in Chapter 1 of the NBAF EIS, DHS's mission is to study foreign animal, zoonotic (transmitted from animals to humans) and emerging diseases that threaten our agricultural livestock and agricultural economy. The NBAF would enable research on the transmission of these animal diseases and support development of diagnostic tests, vaccines, and antiviral therapies for foreign animal, zoonotic and emerging diseases. By proposing to construct the NBAF, DHS is following policy direction established by the Congress and the President. Additional beneficial effects are presented in Section 3.10.

Comment No: 4 Issue Code: 15.6

DHS notes the commentor's viewpoint.

Comment No: 5 Issue Code: 8.6

DHS notes the commentor's statement.

Comment No: 6 Issue Code: 15.0

DHS notes commentor's request for additional information. Appendix C provides detailed information on the populations surrounding each of the proposed sites, including demographic information.

Comment No: 7 Issue Code: 21.0

Appendix D utilizes a case study and literature review approach for assessing the potential economic consequence should one of the pathogens proposed for study at the NBAF be released to the environment

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WD0269

From: [REDACTED]
Sent: Wednesday, August 13, 2008 6:33 PM
To: NBAFProgramManager
Subject: NBAF Lab

1|25.4;
 2|24.1;
 3|5.0;
 1 cont.|
 25.4 | I am writing to express my opposition to putting a NBAF level 4 lab in Manhattan, Kansas. In my view the lab should be placed on Plum Island so that it will be as far away from humans and livestock as possible.

1 cont.|
 25.4 | I do not believe it should be in Manhattan, KS due to the following reasons:

- It has not been proven that the lab can withstand a F4 or F5 tornado. We just had a F4 tornado come through town on June 11, 2008. We are prone to Tornadoes; therefore, putting the lab here will put an undue risk on my family and fiends.
- We are in the heart of livestock country. If a disease such as foot and mouth were to escape it would be devastating to the hundreds upon thousands of citizens who would loose their livelihoods.
- I do not want the lab here due to possible contamination from leaks into the air or water system.
- Many articles say we have lime disease and west Nile virus due to leaks at Plum Island, so there is no guarantee we won't have a leak.
- I don't want to take the risk of someone from the lab doing a terroristic act such what happened with anthrax.

1 cont.|
 25.4 | We strongly oppose a NBAF Level 4 lab in Manhattan, KS.

Kathy and Mike Shields
 [REDACTED]

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 24.1

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative.

Comment No: 3 Issue Code: 5.0

See response to Comment No. 2.

Comment No: 4 Issue Code: 21.4

DHS notes the commentor's concern. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. The risk of an accidental release of a pathogen from the NBAF is extremely low. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and health consequences of potential accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents,, external events, and intentional acts. A separate Threat and Risk Assessment (TRA) (designated as "For Official Use Only") was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and would be used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-biocontainment pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

As discussed in Section 3.14.3.4, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6, would be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal and Plant Health Inspection Service Institutional Animal Care and Use Committee.

DHS notes the commentor's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500-year period. In the unlikely event that a 500-year wind storm strikes

the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Section 3.10.9 and Appendix D. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free.

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WD0077

From: [REDACTED]
Sent: Tuesday, July 15, 2008 10:37 AM
To: NBAFProgramManager
Subject: Hi from Smith Family

Hi,

1) 25.2 | Our family of four lives just a couple of miles down from the proposed site of the NBAF facility
 2) 21.2 | here in Athens, GA. We continue to be majorly concerned about having this facility so close to
 3) 12.2 | our neighborhood and to the State Botanical Gardens of Georgia. We don't think our community
 4) 23.0 | nor our climate should support this venture. We have been to meetings, done our own searches
 on the internet, read about your plans, and the risk to wildlife, livestock and possibly people is
 just too great. Today, we read in the Athens Banner Herald that you now estimate DOUBLE the
 amount of water you said you would use before, and produce vaccines, which you didn't mention
 before. It appears that you gave us "fluff" information at the previous meetings and neglected to
 disclose the full range of activities this facility would engage in.

5) 7.2 | Right now, we drive out of our neighborhood and up the road past a lovely pasture filled with
 6) 21.2 | beautiful horses, and turn onto the pretty south end of Milledge Avenue past more fields and into
 7) 15.2 | the Botanical Gardens - a true paradise in it's own right. Your facility would forever change not
 only the scenery, but the feelings of peace we all feel living in this area. It would change the use
 of public utilities, cause security concerns, and make everyone wonder each time a mosquito
 bites them whether or not it could have escaped from NBAF. It's not going to contribute to the
 fighting of poverty here. It will affect property values - who wants to live down the street from
 a Bio Hazard Lab? We don't.

1 cont. | 25.2 | While we understand that your people can conduct valuable research, we STRONGLY
 DISAGREE that the research should be conducted here in Athens.

Please mark us down as 4 Athenians who do not want to see this facility built in our community.

Thank you very much.

Amy, John, Harrison & Maddie Smith

The Famous, the Infamous, the Lame - in your browser. [Get the TMZ Toolbar Now!](#)

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 21.2

DHS notes the commentors' concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1 of the NBAF EIS, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF. However, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden as indicated in Sections 3.8.3.2 and 3.8.3.3.

To minimize risks to wildlife, livestock, and humans, the NBAF would be designed and constructed using modern biocontainment technologies, and operated by trained staff and security personnel to ensure the maximum level of worker and public safety and least risk to the environment in accordance with all applicable federal, state, and local laws and regulations.

It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia employ modern biocontainment technologies and safety protocols, such as would be employed in the operation of the NBAF. An analysis of potential consequences of a pathogen (e.g., Rift Valley fever virus) becoming established in native mosquito populations is addressed in Sections 3.8.9, 3.10.9, and 3.14.

Comment No: 3 Issue Code: 12.2

DHS notes the commentor's drought concerns and acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens' current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes.

Comment No: 4 Issue Code: 23.0

DHS notes the commentor's concern that all possible pathogens to be studied at the NBAF are not listed in the NBAF EIS. The pathogens to be studied at the NBAF as provided in Chapter 2, Section 2.2.1 of the NBAF EIS include Foot and Mouth Disease virus, Classical Swine Fever virus, Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever virus. Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluate of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk

assessment would be prepared and a separate NEPA evaluation may be required.

Comment No: 5

Issue Code: 7.2

DHS notes the commentor's concern regarding the visual effects of the NBAF at the South Milledge Avenue Site, which are described in Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area.

Comment No: 6

Issue Code: 21.2

DHS notes the commentor's concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. An analysis of potential consequences of a pathogen (e.g., Rift Valley fever virus) becoming established in native mosquito populations, particularly in warm, humid climates, was evaluated in Sections 3.8.9, 3.10.9, and 3.14 of the NBAF EIS.

Comment No: 7

Issue Code: 15.2

DHS notes the commentors' concern regarding poverty and property values. The economic effects of the NBAF are discussed in Section 3.10.3 of the NBAF EIS. Labor income from construction of the NBAF is projected at approximately \$150 million while NBAF operations would generate approximately \$28 million in wages annually.

There is no empirical evidence that a facility such as the NBAF would reduce property values in the study area. As discussed in Section 3.10.3.3, the housing market would be able to meet the increase in housing demand (326 employees in total), relative to the estimated growth of the existing population between 2007 and 2012 (13,663). It is possible that with the relocation of highly skilled workers to the immediate area, property values could increase due to an increase in demand.

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WD0844

From: Laura Straehla [REDACTED]
Sent: Monday, August 25, 2008 8:01 PM
To: NBAFProgramManager
Subject: Athens, GA NBAF site

1) 25.2
2) 13.2
3) 12.2
4) 9.2
cont.] 1) 25.2

We are definitely opposed to the NBAF DEIS location here in [REDACTED] GA due to it's detrimental affect on the environment, especially the actual site near the State Botanical Garden, and possible long-term effects on our water & air supplies. Please do not locate this facility in our community!

Jimmy & Laura Straehla
[REDACTED]

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the Botanical Garden. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife. The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9 of the NBAF EIS. Although the NBAF EIS acknowledges the potential for significant wildlife impacts in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF. Furthermore, the purpose of NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Comment No: 3 Issue Code: 12.2

DHS notes the commentor's concern regarding air quality. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the South Milledge Avenue Site are discussed in Section 3.4.3.

Comment No: 4 Issue Code: 9.2

DHS notes the commentor's concerns. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the South Milledge Avenue Site are discussed in Section 3.4.3. Air pollutant concentrations were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model would be used during the permitting process. The final design will ensure that the NBAF does not significantly affect the region's ability to meet air quality standards.

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MD0013

U.S. Dept. Homeland Security
Science and Technology Directorate, James V. Johnson
Mail Stop 2100, 245 Murray Lane SW, Building 410
Washington, D.C. 20528

July 31, 2008

Dear Sir:

1| 25.3 As residents of the area in North Carolina where locating the National Bio and Defense Facility is being considered, with this letter we are stating our opposition to the laboratory being located here.

2| 12.3 For an area that has experience severe drought last year and part of this year and the water table has not yet reached normal levels, it is therefore difficult to comprehend how the water needs for the laboratory could possibly be met or how the treated water from the laboratory would not comprise the quality of the drinking water.

The water needs for the expanding population of the area is a constant concern for the local governments and thus far a satisfactory solution has not been found.

When the population has been forced to reduce its use of water, and some businesses have had to close because of water consumption being regulated by local government a laboratory using the volume of water required by this facility would be totally unacceptable.

3| 21.3 The potential environmental, economic and health risks are too great not only for the area but for the entire State of North Carolina.

Sincerely,



David and Ann Thompson



Copy: Rep. Brad Miller, Congressional District 13

Comment No: 1 Issue Code: 25.3

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 12.3

DHS notes the commentor's water supply concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.7.3.1 of the NBAF EIS, the South Granville Water and Sewer Authority has 3 to 4 million gallons per day of excess potable water capacity and could meet NBAF's need of approximately 110,000 gallons per day, less than 0.4% of the Authority's total current capacity. The NBAF potable water usage is comparable to 210 residential homes' annual potable water usage.

Comment No: 3 Issue Code: 21.3

DHS notes the commentor's concern regarding the siting, construction and operation of the NBAF at the Umstead Research Farm Site. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur and consequences of those accidents. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some "accidents" are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low.

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WD0116

From: Grady Thrasher, III [REDACTED]
Sent: Monday, July 28, 2008 11:06 AM
To: [REDACTED]
Cc: NBAFProgramManager
Subject: FW: FAQinc letter re NBAF DEIS
Attachments: FAQinc2 Letter to Heidi updated July 19, 2008.doc

Dear Oconee County Commissioners,

1 | 25.2

The inquiries in the attached letter to the Athens Clarke County Mayor Heidi Davison apply to and are very important to the citizens Oconee County, many of whom have signed our petition to stop NBAF from being located so close to our neighborhoods, schools, and places of worship and recreation. In many ways Oconee County could be adversely affected even more directly by NBAF's proposed location at S. Milledge Ave. and Whitehall (overlooking and just upstream from several Oconee County neighborhoods). Please consider the questions posed and advise us of your positions regarding NBAF and the DEIS.

Your responses will be greatly appreciated.

Grady Thrasher and Kathy Prescott



For Athens Quality-of-life
www.athensfaq.org

-----Original Message-----

From: Grady Thrasher, III [<mailto:hgt@thrasher.com>]
Sent: Monday, July 28, 2008 10:46 AM



NBAFProgramManager
Subject: FAQinc letter re NBAF DEIS

Heidi,

Comment No: 1

Issue Code: 25.2

DHS notes the commentator's opposition to the South Milledge Avenue Site Alternative.

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Since the scoping meetings are only about two weeks away, the answers to the questions raised in our letter to you dated July 11 are becoming more and more critical. Since we haven't heard from you and now find you will be out of the office for a week, we believe it is necessary to include the other ACC Commissioners as well as the Oconee County Commissioners in our inquiry.

We trust the ACC government will act in the best interests of community awareness and make public what position each of the Commissioners will take regarding NBAF and the issues raised by the DEIS prior to August 14.

Best regards,

Kathy Prescott and Grady Thrasher
For Athens Quality-of-life
www.athensfaq.org

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WD0116

FAQinc. "For Athens Quality-of-life"
196 Alps Road, Suite 2, Box 205
Athens, Georgia 30606
www.athensfaq.org

July 11, 2008 (updated July 28, 2008)

Mayor Heidi Davison
235 Wells Drive
Athens, Georgia 30606

Dear Heidi,

We trust you are doing well and that among the many important issues you deal with every day as our Mayor, you are staying tuned to the continuing NBAF saga.

As you know, the Department of Homeland Security recently released its draft Environmental Impact Statement for comment during the 60 day "on the record Scoping Period" which ends August 25, 2008. We needn't remind you that DHS will be in Athens on August 14, 2008 for two public meetings to receive citizen (and institutional) questions, concerns and commentary on risks and environmental degradation associated with the proposed NBAF being built and operated next to our State Botanical Garden.

FAQinc. "For Athens Quality-of-life" is engaged (through its citizen-supporters as well as hired professionals) in deciphering and interpreting the massive, often dense and sometimes contradictory DEIS with a goal of explaining to our community how, if at all, the DEIS answers those many questions of concern to Athenians and residents of surrounding communities.

Given that the DEIS contains a thousand or so pages of information, it is easy to be seduced by its Executive Summary and over-simplified charts such as the "Comparison of Environmental Effects" (Table ES3). That summary and those charts tend to mislead rather than inform because they gloss over and in many cases *contradict*, important details contained in the body and appendices of the DEIS. *In assessing community health and safety the summary statements provided are completely inconsistent with*

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the facts and conclusions admitted to in the broader text. We raised this important issue at the DHS Scoping Meeting in Washington, DC on July 24. After the meeting, representatives of Dial Cordy made a special effort to acknowledge their concerns with the Executive Summary and summary charts in the EIS and to assure us that the misrepresentations would be corrected in the final EIS. But the real concerns raised in the body and appendices of the DEIS need to be examined carefully and candidly now, before the Athens Scoping Meetings scheduled for August 14.

In any event, we at FAQ intend to do our part to help inform and advise the citizenry of Athens/ Clarke, Oconee and adjacent counties regarding the DEIS and the need for citizen input. But we still look to the ACC government as the ultimate protector of our community's public health, safety and welfare. In this regard we at FAQ have several questions we hope you will help us answer regarding the NBAF site selection process. They are:

(1) Since we all now have an abundance of new information with which to evaluate NBAF (whether revealed by Congressional inquiry, the Associated Press, contained in the DEIS or now revealed in the NBAF Feasibility Study just obtained through the Freedom of Information Act), what role will the ACC government play in interpreting, vetting and verifying all this new information so that appropriate questions and comments can be raised and made to DHS during the NEPA mandated Scoping Period and at the Athens scoping meetings scheduled for August 14? Will you attend the meetings and give comments? If so, will you be acting in your official capacity as Mayor or as an individual? If in your official capacity, will you seek official action by the ACC Commissioners before making representations regarding the position of the ACC government? Will you make it clear to DHS in which capacity you will be speaking?

(2) If the ACC government chooses not to take a proactive role in the NBAF site selection process, on whose advice or recommendation will you and the ACC Commissioners rely with regard to the information presented in the DEIS that involves providing infrastructure and related services (such as water, sewer and traffic abatement), all of which may require effort and expenditure by the ACC government?

(3) On issues regarding public health and safety as presented in the DEIS (deemed "moderate" in the full text, but shown as "insignificant" in the

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disingenuous Executive Summary, on whose advice or recommendation will you and the ACC Commissioners rely in determining whether to support, oppose or question the information, conclusions or deferred decisions discussed (or, in some cases, avoided) in the DEIS?

Some information contained in the DEIS not previously in the public sphere of knowledge about NBAF includes (this list is by no means all-inclusive):

(1) **DHS concedes the safest location for NBAF (among the six sites in contention) would be Plum Island.** This determination alone should end the competition—but it hasn't.

(2) **DHS leaves open the question of whether NBAF will use incineration as its primary pathological waste (infected carcasses) disposal method.** This raises and leaves unanswered air quality questions in the face of previous assurances from UGA and DHS that NBAF would be a "green" non-polluting industry. The DEIS discloses that NBAF, if incineration is used for carcass disposal, would be a "major Title V emission source" requiring permitting from local and state authorities.

(3) **The average projected daily water usage at NBAF has doubled to over 117,000 gallons per day in contrast to the DHS representatives' assurances during the DHS "town meeting" held in May of less than half that amount.** The usage could go as high as 275,000 gpd during our hot, dry summer months, coinciding with the times our water sources are most vulnerable to drought.

(4) **Contrary to misinformation given by Dr. Larry Barrett (representing DHS at the Athens town meeting), all of the zoonotic diseases to be studied at NBAF are transmitted by aerosol or airborne means, and there have been instances where Nipah virus has spread from human to human.**

(5) **NBAF will have an "Insectary", a breeding facility for mosquitoes and other insect carriers of the studied pathogens such as Rift Valley fever, a disease that can be spread to humans.**

(6) **Contrary to DHS misinformation provided at the town meeting, NBAF will study the effects of pathogens on large herds of large animals--not small groups of small animals, thereby creating an**

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unprecedented bio-hazardous waste disposal challenge for Athens, the effective handling of which is still undetermined.

(7) As revealed by the Government Accountability Office in May and admitted by DHS in the DEIS, accidents in bio-containment labs do happen—frequently. Most, if not all, result from human error or malfeasance. According to the GAO, technology cannot save us from our own failings. An accident involving Foot and Mouth virus could have a staggering economic downside measured in billions of dollars. The virus, which is possibly the world's most contagious, is carried on workers' breaths, in their throats, nasal passages and under their fingernails, among other areas. Deer and other wildlife are susceptible, not just cows, pigs and horses. The custodial workers will have daily contact with infected animals spewing virus from all of their orifices. It would seem only a matter of time before the virus, by accident or design, found its way into our receptive environment.

(8) The DEIS admits to environmental degradation during NBAF construction, a period of time estimated to last at least four years, but likely much longer if UGA's Animal Health and Research Center, which took more than 12 years to build at three times its initial budget to and is just now achieving full certification, is any example.

(9) The DEIS acknowledges noise, visual and light pollution affecting visitors to the State Botanical Garden, but dismisses NBAF's effect on the Important Bird Area joining the Botanical Garden with Whitehall Forest because the proposed NBAF site in the middle of the IBA is "mostly pasture".

(10) The DEIS acknowledges NBAF will aggravate traffic congestion on South Milledge and Whitehall.

(11) The DEIS does not adequately take into account NBAF's dramatic effect on nearby neighborhoods in Clarke and Oconee County, although it admits to a 6.5 mile radius "infection zone" if there is a pathogen release. *This zone includes about 50,000 people—90,000 more on Game Day.*

It is clear that an NBAF at the offered location in Athens would bring real public health and economic risks plus environmental degradation, as now

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WD0116

revealed by the DEIS and the GAO. Further, the DEIS leaves open questions of local government responsibility and cost yet to be answered or even fully examined. **But the bottom line is the certainty that NBAF in Athens would in many ways adversely compromise the quality of life in our community. The DEIS admits that a pathogen outbreak or release would have a devastating effect on the public health, safety and economy of our entire region.** This is not a risk our civic leaders need to casually assume for our community.

FAQ represents thousands of Athenians who are opposed to NBAF. Almost 2000 brave citizens have signed our "No NBAF" petition and many more have voiced their support of and appreciation for FAQ's opposition to NBAF. **Whether you agree with FAQ or not, we believe all Athenians deserve a fair, critical and impartial inquiry by our elected representatives into the issues raised or avoided by the DEIS. The ACC government should rely on advice from disinterested parties, not ones affiliated with the University of Georgia, the lead proponent of NBAF in Athens. The UGA administration has demonstrated disingenuousness from the beginning in its advocacy of NBAF and has in many cases used its economic influence over employees and affiliates to dampen local opposition. In the interest of the entire community the results of your independent inquiry should be made public prior to the Scoping meetings on August 14.**

We thank you for your attention to this critical situation, and we look forward to hearing from you at your earliest opportunity.

Best regards,

Kathy Prescott and Grady Thrasher
for FAQ "For Athens Quality-of-life"

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WD0847

From: [REDACTED]
Sent: Monday, August 25, 2008 8:12 PM
To: NBAFProgramManager
Subject: No to NBAF in Athens

1| 5.2 | Please except this big NO to NBAF in Athens, Georgia

Thank you.

Martin A. Ursitti
Jan E. Ursitti

Comment No: 1 Issue Code: 5.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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WD0025

From: Wilkes [REDACTED]
Sent: Tuesday, July 01, 2008 3:09 PM
To: NBAFProgramManager
Subject: no NBAF in Athens

- 1| 25.2 We don't want NBAF in Athens Georgia.
- 2| 24.1 1) Plum Island is best!
- 3| 12.2 2) NBAF will use too much water. We already have a water problem in GA. AND it isn't getting any better.
- 4| 13.2 3) Too close to: Botanical Gardens, UGA, Athens, people, etc.
- 5| 21.1 Stay on Plum Island where the environmental impact will be minimal and keep diseases on the island.

Donald E. Wilkes
Elizabeth Wilkes

[REDACTED] GA [REDACTED]

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 24.1

DHS notes the commentor's support for the Plum Island Site Alternative.

Comment No: 3 Issue Code: 12.2

DHS notes the commentor's drought concerns and acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site would use approximately 118,000 gallons per day of potable water, an amount that is approximately 0.76% of Athens' current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes.

Comment No: 4 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the South Milledge Avenue Site along the Oconee River is a high value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. The high value forested riparian corridor would be preserved; and therefore, the proposed NBAF would not have significant direct impacts on wildlife dispersal between the State Botanical Garden and Whitehall Forest. Section 3.5.5.3 addresses operational noise impacts associated with the proposed NBAF. Minor noise impacts would result from an increase in traffic and operation of the facility's filtration, heating, and cooling systems. Section 3.5.5.3 describes noise-attenuating design features that would minimize noise emissions. In the event of a power outage, operation of back-up generators could have a short-term impact on wildlife by discouraging utilization of immediately adjacent habitats. Routine operations at the NBAF would not be likely to have significant noise impacts on wildlife. Security requirements at the proposed NBAF would require continuous outdoor nighttime lighting. Nighttime lighting has the potential to impact wildlife through astronomical and ecological light pollution. Mitigation measures, such as the use of shielded lighting, will be considered in the final design of the NBAF. The use of shielded lighting would minimize the potential for impacts in adjacent habitats.

Comment No: 5 Issue Code: 21.1

DHS notes the commentor's support for the Plum Island Site Alternative. The NBAF EIS fully analyzes the Plum Island Site Alternative. The conclusions expressed in Section 3.14 of the NBAF

EIS show that even though the Plum Island Site has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the lack of livestock and susceptible wildlife species.

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WD0220

From: Grady Thrasher, III [REDACTED]
Sent: Sunday, August 10, 2008 8:58 AM
To: [REDACTED] Jim Thompson
Subject: Open Letter to Mayor Heidi Davison
Attachments: heraldsun.com Chamber leader withdraws support of lab.htm

1|27.0 | Pete and Jim,

This is a letter sent today to Mayor Heidi Davison from FAQinc. "For Athens Quality-of-life" in response to her comments published in today's ABH. It is intended to be an "open letter". Please feel free to publish it if you feel it is newsworthy. FAQ believes it is.

Thank you,

Kathy and Grady

-----Original Message-----

From: Grady Thrasher, III [REDACTED]
Sent: Saturday, August 09, 2008 10:19 PM
[REDACTED]
Subject: Open Letter to Mayor Heidi Davison

Mayor Davison,

The tide has turned against the special interests and in favor of the people of the Athens area. The truly informed people of Athens and Oconee County are rejecting the nightmare NBAF would be on S. Milledge, next to the Botanical Garden--a nightmare that you, as our Mayor, invited DHS to impose on our community. Your action was apparently based on now discredited propaganda from DHS and UGA, and was taken without citizen input. At the time there was very little substantive understanding by you or anyone in the ACC government of the full scope of the problems, risks and costs NBAF involved. Even if you acted in good faith at the time, your letter to DHS saying "We stand ready to accept this facility" can now only be seen, based on credible examination, as ill-considered and irresponsible. We ask you as our friend, neighbor and fellow Athenian, to reexamine your earlier actions and reject NBAF in light of the facts revealed by the Government Accountability Office and the DEIS, itself. Saying "No" to NBAF would protect, rather than exploit, Athens' unique quality of life and would be in accordance with the wishes of an overwhelming majority of the people of the community.

Comment No: 1

Issue Code: 27.0

DHS notes the information submitted by the commentor.

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WD0220

From: Grady Thrasher, III [REDACTED]
Sent: Sunday, August 10, 2008 8:58 AM
To: [REDACTED] Jim Thompson
Subject: Open Letter to Mayor Heidi Davison
Attachments: heraldsun.com Chamber leader withdraws support of lab.htm

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Thank you,

Kathy and Grady

-----Original Message-----

From: Grady Thrasher, III [mailto:ght@thrasher.com]
Sent: Saturday, August 09, 2008 10:19 PM

[REDACTED]
Subject: Open Letter to Mayor Heidi Davison

Mayor Davison,

The tide has turned against the special interests and in favor of the people of the Athens area. The truly informed people of Athens and Oconee County are rejecting the nightmare NBAF would be on S. Milledge, next to the Botanical Garden--a nightmare that you, as our Mayor, invited DHS to impose on our community. Your action was apparently based on now discredited propaganda from DHS and UGA, and was taken without citizen input. At the time there was very little substantive understanding by you or anyone in the ACC government of the full scope of the problems, risks and costs NBAF involved. Even if you acted in good faith at the time, your letter to DHS saying "We stand ready to accept this facility" can now only be seen, based on credible examination, as ill-considered and irresponsible. We ask you as our friend, neighbor and fellow Athenian, to reexamine your earlier actions and reject NBAF in light of the facts revealed by the Government Accountability Office and the DEIS, itself. Saying "No" to NBAF would protect, rather than exploit, Athens'unique quality of life and would be in accordance with the wishes of an overwhelming majority of the people of the community.

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WD0220

We look forward to seeing you at the scoping meetings on Thursday. We hope you've had a chance to read the full DEIS. Please don't be lulled into complacency by the misleading Executive Summary or swayed by the twisted rationale of the proponents of NBAF into continuing to foster their reckless agenda.

Best regards,

Kathy Prescott and Grady Thrasher
for FAQinc."For Athens Quality-of-life"

-----Original Message-----

From: Grady Thrasher, III [REDACTED]
Sent: Saturday, August 09, 2008 9:40 PM

[REDACTED]
Subject: Emailing: heraldsun.com Chamber leader withdraws support of lab

The President of the Butner Chamber of Commerce withdraws his support for NBAF, admitting he didn't have enough information when he recommended NBAF as a "no brainer" last year.

See article attached below.

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Page 4 of 5

WD0220

Chamber leader withdraws support of lab

By William F. West : The [Henderson] Daily Dispatch
The Herald-Sun
Aug 9, 2008

BUTNER -- Further evidence of eroding local public support for having a proposed germ-fighting lab at Butner is now apparent in the changed stance of Granville County Chamber of Commerce President Johnny Balmer.

Balmer, at the time the Oxford-based civic organization's president-elect, had cited the potential influx of jobs and money in having the National Bio and Agro-Defense Facility. "It's a no-brainer. It's good for Granville County," Balmer said last October.

"A lot of times, when people have a not-in-my-backyard mentality, they don't think through the process of the economic benefit to the county," Balmer said.

Now, the chamber president is saying he is neutral.

On Thursday night, Balmer sat in the audience and watched as the Butner Town Council unanimously voted not to endorse having the NBAF in southern Granville County.

Councilman Edgar Smoak, who led the vote, cited an extensive list of environmental and safety concerns he said were not addressed in a recent draft document by the federal Department of Homeland Security.

Butner's governing body as a whole previously had been maintaining a neutral stance.

At the end of the meeting, Balmer was asked about his position on the NBAF, particularly given his comments last fall.

Balmer asserted that his comment several months ago was before DHS was supposed to furnish much of the information discussed Thursday by the Butner Town Council.

"Since then, I have taken a 'Stop-and-look-see approach'," Balmer said.

When asked whether that means he is not taking sides, he replied in the affirmative.

Balmer then stated he was responding as an individual -- not as the chamber president.

Meanwhile, the North Carolina Consortium for the National Bio- and Agro- Defense Facility said it is continuing to evaluate its position following renewed expressions of concern relative to the draft document.

The NCC-NBAF said in a release Friday that it believes strongly that the NBAF program would help protect the U.S. livestock industry, enhance public health and bring significant economic benefit to the Granville County region. However, the consortium remains concerned by claims from citizens and elected officials that DHS has not adequately addressed their concerns.

Responding to follow-up e-mail questions Friday, Balmer said the chamber's position is neutral, with the word neutral underlined and in capital letters.

Balmer on Thursday night said that a chamber board meeting, set for Tuesday morning in Oxford, would include the NBAF matter as a subject of discussion.

Balmer, in his e-mail Friday, said the upcoming meeting will not include the NBAF, but will be a normal session.

"The statement that I made concerning talking about the NBAF in the meeting was merely a check of members to see if the board's position had changed," Balmer said.

In addition to Butner, NBAF sites being considered are at Athens, Ga., San Antonio, Texas, Manhattan, Kan., and a town near Jackson, Miss.

Another alternative would be building a new research lab on Plum Island, N.Y., while a seventh option includes not building the NBAF at all. The NBAF, if approved for construction, would replace an aging lab at Plum Island, which is located at the tip of Long Island.

DHS has maintained the draft document showed there would be no adverse impact on the sites nationwide under consideration, including Butner.

Opposition leaders in Granville County have scoffed at the claim, arguing that the document does not address several pertinent questions, such as how those in mental hospitals and prisons in Butner would be evacuated in an emergency situation.

DHS said a final document should be ready by this fall, with a final decision to be made before the end of the year. DHS said if the NBAF is built, then

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WD0220

the lab will be ready by 2015.

 << comment on this story >>

No comments have been posted.

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Page 1 of 2

Aug 20 08 06:34a Bill & Eileen Jackson [REDACTED] p.1 FD0022

NATIONAL BIO AND AGRO-DEFENSE FACILITY
Draft Environmental Impact Statement
Comment Form

Personal information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Bio and Agro-Defense Facility Environmental Impact Statement.

Name: William P Jackson
 Title: Citizen of KS & USA
 Organization: _____
 Address: [REDACTED]
 City: [REDACTED] State: KS Zip Code: [REDACTED]

Comments: First off I believe a public
Hearing like we attended 7-31-08
is no more than a facition. Our
Concerns mean nothing
Our Governor strongly opposed the
Coal fired generators in western
Kansas. I agreed with her, but
I would rather have 5 of those
generators in my back yard
than one of these 3 headed
Monsters 20 miles down the
road.
You have 800 acres where this
kind of research is already occurring
It won't cost anymore to put

(Continued on back for your convenience)

Comment No: 1

Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2

Issue Code: 24.1

DHS notes the commentor's support for the Plum Island Site Alternative.

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Aug 20 08 06:35a Bill & Eileen Jackson

p.2

FD0022

2 cont.
24.1

this monster right along side what is already there.

I also believe scaring people with FMD is just slightly worse than BSE. I am sure FMD is being researched to death somewhere (it isn't in the U.S.A. study in Europe).

Unlike most of the people testifying in favor of this monster, I have nothing to gain or lose for that matter. One mistake and that will all change. Based on my philosophy if it could be that bad in Manhattan KS, it would be equally bad anywhere it's built.

3/5.0

Thanks for listening (or reading)

Bill Jackson

THANK YOU FOR YOUR COMMENTS

Please return this form to the comment table. It may also be mailed or faxed as follows:

U.S. MAIL

U.S. Department of Homeland Security
Science and Technology Directorate
James V. Johnson
Mail Stop #2100
245 Murray Lane, SW
Building 410
Washington, DC 20528

TOLL-FREE FAX

1-866-508-NBAF (6223)

Comment No: 3

Issue Code: 5.0

DHS notes the commentor's opposition to the NBAF, particularly the Manhattan Campus Site Alternative.

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08/20/2008 16:11 FAX 785 539 2358 IRVINE REAL ESTATE 2002 FD0029

**National Bio and Agro-Defense Facility
Draft Environmental Impact Statement
Comment Form**

Personal information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Bio and Agro-Defense Facility Environmental Impact Statement.

Name: Don Whillon & Ade Whillon
 Title: Private Citizens
 Organization: N/A
 Address: [REDACTED]
 City: [REDACTED] State: KS Zip Code: [REDACTED]

Comments: We oppose the installation of the National Bio and Agro-Defense Facility on Mainland Kansas. The consequence of a security failure dominates all the advantages the NBAF holds. NBAF has apparently failed to properly maintain its building. Maintenance in its self a safety factor. Would there be any reports? We must consider & analyze the population's pros & cons. The Manhattan Meeting, a very favorable reception of NBAF's location at KSU. Analyze this, 90% of those taking part in the evening's program, were directly or indirectly involved in the local infrastructure of the City, Country, state, national & on the KSU. This group focused on

(Continued on back for your convenience)

Comment No: 1 Issue Code: 25.0

DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 2 Issue Code: 5.0

See response for Comment No: 1.

Comment No: 3 Issue Code: 21.0

DHS notes the commentor's concern for security of the NBAF. Regardless of location, the NBAF would have the levels of protection and control required by applicable DHS security directives. A Threat and Risk Assessment (designated as For Official Use Only) (TRA) was prepared that evaluated site-specific security issues and will be considered in the decision making process on whether or not the NBAF is built, and, if so, where.

Comment No: 4 Issue Code: 23.0

DHS notes the commentor's concern regarding the NBAF. The purpose and need for the proposed action is discussed in Chapter 1 of the NBAF EIS. DHS can not guarantee that the NBAF would never experience an accident. However, as discussed in Section 2.2.1.1, modern biosafety design substantially diminishes the chances of a release as the primary design goal is to provide an adequate level of redundant safety and biocontainment that would be integrated into every component of the building. DHS would maintain the NBAF and ancillary facilities in compliance with applicable environmental, safety, and health requirements and provide for safe operation and maintenance.

Comment No: 5 Issue Code: 4.4

DHS notes the commentor's concerns regarding the location and timing of the NBAF EIS public meeting held in Manhattan, Kansas. Upon completion of the NBAF Draft EIS, it was published without delay and public meetings were then scheduled in each of the communities being evaluated for siting the NBAF during the ensuing 60-day public comment period. DHS gave preference to holding meetings at locations in each community proximal to the proposed NBAF site and at appropriate meeting venues offering sufficient space to accommodate anticipated attendance levels. DHS recognizes that it is not possible to hold a public meeting at a time and place that is convenient to every interested person, and therefore provides alternate means of submitting comments to provide multiple opportunities to participate in the NEPA process. In addition to oral comment at the public meetings, DHS also accepted comments submitted by mail, telephone and fax lines, and online through the NBAF Web page (<http://www.dhs.gov/nbaf>). All comments, both oral and written, received during the comment period were given equal consideration and have been responded to in this NBAF Final EIS.

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08/20/2008 16:13 FAX 785 539 2358 IRVINE REAL ESTATE 0033
FD0029

5 cont. 4.4
6) 23.0

*on contributions to the local economy,
the number one priority. Not a conducive
factor for retired & working class Americans.
This lab will fall in the category
of "Level 4" right now. This "right now"
was exposed to at meeting. This to
me indicates the level 4 is only a
starting point with all intentions of
going to a higher level that resembles
"right now" I question and every
concerned citizen should too.*

Ada L. Whitton
Ada L. Whitton

THANK YOU FOR YOUR COMMENTS

Please return this form to the comment table. It may also be mailed or faxed as follows:

U.S. MAIL	TOLL-FREE FAX
U.S. Department of Homeland Security Science and Technology Directorate James V. Johnson Mail Stop #2100 245 Murray Lane, SW Building 410 Washington, DC 20528	1-866-508-NBAF (6223)

Comment No: 6

Issue Code: 23.0

DHS notes the commentor's concern regarding the NBAF. As presented in Section 1.1 of the NBAF EIS, the NBAF research mission would be based on current pathogen and disease risk assessments, subject to change as threats and risk assessments change. Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluation of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk assessment would be prepared and a separate NEPA evaluation may be required.

There are four biosafety levels (BSL) used to designate and regulate lab work with microorganisms. The range is BSL-1 in which the microorganisms are not known to cause disease in healthy adult human beings to BSL-4 in which the microorganisms pose a risk of life-threatening disease and for which there is no known vaccine or therapy.

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WD0381

From: info@athensfaq.org on behalf of Charles W. Sapp [REDACTED]
Sent: Tuesday, August 19, 2008 7:18 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

Dear NBAF Program Manager,

I can't believe that after thirty-five years in [REDACTED], Georgia, I will have to move if you locate your facility here. I am a UGA alumnus, but I am under no illusions as to the self-serving motivation of the present UGA administration. The fact that UGA continues a land-grab in this county, taking property out of the tax base and shifting the burden to the small taxpayer demonstrates UGA's callous disregard for the citizens of this community.

1/25.2 The university in NO WAY represents the interests of the citizens of Athens. We don't want your jobs; we don't want to finance your facility and infrastructure; we don't want your waste in our air, our water, and our landfills. We don't even want your agency to exist.

In conclusion, if anything is not clear from the above, please advise and I can expand further.

Sincerely,

Charles W. Sapp

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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MD0080

Please include these
comments on the record
regarding the NBAF DEIS
re Athens, GA
opposition

Thank you
8/21/08

To: The Department of Homeland Security
Washington, DC scoping meeting
July 24, 2009

Ladies and Gentlemen"

In preparing your final EIS regarding the Athens, GA proposed NBAF site, please include DHS's response to the following comments and questions raised during the previous scoping period (*the DEIS failed to adequately address or answer these and other questions which were clearly presented during the previous scoping period*):

1. **The Georgia State Botanical Garden.** The State Botanical Garden, adjacent to the site proposed for NBAF, in its website www.uga.edu describes among its many benefits to our community, the wide variety of natural physiographic features and plant and animal communities found within the Garden's ecological areas, wetlands, floodplains, slopes and upland plateaus. Sites of archeological interest include old home sites and rock mounds of undetermined origin. Construction and operation of a massive project such as NBAF on the proposed site, all along the border of the Garden and above and near the Oconee River, will unavoidably and permanently adversely affect the natural setting of the Garden and its populations of wildlife, rare plants and birds (see #2 below). How does DHS plan to deal with the environmental, ecological, as well as habitat and archeological disruptions and degradation caused by NBAF located at this site?

2. **The Proposed Location Disrupts and Degrades an Important Bird Area.** Since the proposed location lies directly between the two necessary components (the State Botanical Garden—adjacent to the proposed site and Whitehall Forest—less than ½ mile away) of an *Important Bird Area* ("IBA"), designated by the National Audubon Society, NBAF would degrade, disrupt otherwise diminish the continuous natural setting required for the IBA to serve as such. A designated IBA is a site that supports endangered or threatened bird species, including range restricted species, habitat restricted species and species vulnerable due to congregatory behavior. How can NBAF's intrusion with heavy construction, vehicle and human traffic, and light and noise pollution not seriously degrade or even destroy this critical IBA?

3. **Water.** Water is a vital and extremely limited resource for our community. Water is also a prerequisite need for NBAF's operation, at the rate of 118,000 gallons per day. Athens' reservoir last September had only a 6 to 8 weeks' supply left. This year, the drought continues. The Middle Oconee River, which would be adversely impacted by NBAF, continues at its lowest level in decades, and there are few, if any, alternative sources of water available to our city that are not also being sought after by competing communities, including Atlanta. With no drought relief predicted this year, we could be running on empty. NBAF would aggravate the current and continuing water crisis facing

Comment No: 1

Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden and the Middle Oconee River. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high-value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. Construction would occur primarily on disturbed pasture areas, and the high value forested riparian corridor would be retained. Section 3.5.5.3 describes noise-attenuating design features that would minimize operational noise emissions. In the event of a power outage, operation of back-up generators could have a short-term impact on wildlife by discouraging utilization of immediately adjacent habitats. Routine operations at the NBAF would not be likely to have significant noise impacts on wildlife. Security requirements at the proposed NBAF would require continuous outdoor nighttime lighting. Nighttime lighting has the potential to impact wildlife through astronomical and ecological light pollution. Lighting would have the potential for adverse impacts (i.e., repulsion and interference with foraging behavior) on resident wildlife immediately adjacent to the NBAF. Mitigation measures, such as the use of shielded lighting, will be considered in the final design of the NBAF. Given the relatively low profile of the building and the use of mitigation measures, significant lighting impacts on migratory birds would not be likely to occur.

The potential impacts of an accidental release on wildlife are addressed in Section 3.8.9. Although the NBAF EIS acknowledges the potential for significant impacts on other species of wildlife in the event of an accidental release, the risk of such a release is extremely low (see Section 3.14). It has been shown that modern biosafety laboratories can be safely operated in populated areas and in areas with abundant wildlife. State-of-the-art biocontainment facilities such as the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF. Furthermore, the purpose of the NBAF is to combat diseases that could have significant effects on wildlife. Research at the NBAF would include the development of vaccines for wildlife that could prevent adverse impacts from a foreign introduction.

Retention of the forested buffer and the use of other mitigation measures would minimize potential impacts on the Middle Oconee River. As described in Section 3.8.3.2.3, best management practices and requirements for a stormwater pollution prevention plan would mitigate potential erosion and sedimentation impacts during the construction process. As described in Section 3.8.3.3.3, low impact design (LID) features would be used to minimize the potential for adverse impacts associated with stormwater runoff from the completed facility. Preliminary LID measures that are being considered

include pervious pavement in both parking lots and pedestrian walkways, capturing and using roof runoff for landscape watering, and grading parking lots to filter storm water through landscaped areas.

Comment No: 2

Issue Code: 12.2

DHS notes the commentor's drought concerns and DHS acknowledges current regional drought conditions. As described in Section 3.7.3.3.1 of the NBAF EIS, the South Milledge Avenue Site alternative would use approximately 118,000 gallons per day of potable water an amount that is approximately 0.76% of Athens current annual average of 15.5 million gallons per day usage. The NBAF annual potable water usage is expected to be approximately equivalent to the amount consumed by 228 residential homes.. The South Milledge Avenue Site alternative would have access to 3 surface water resources: the North Oconee River, the Middle Oconee River, and the Jackson County Bear Creek Reservoir. The access to 3 surface water resources will help ensure the availability of water in the event that any one of those sources becomes inadequate.

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MD0080

2 cont.] 12.2

Athens (we're in the second long-term drought— each over two years in duration, this decade). How would DHS solve the water problem?

3] 5.0

4. **Safety.** The DEIS clearly shows that the safest location for NBAF, if anywhere at all, would be Plum Island, and 800 acre island already owned by DHS. The DEIS fails to show compelling reasons for incurring greater risks by placing NBAF anywhere on the U. S. mainland. Why does DHS persist in this effort?

5. **General.** *The competitive approach DHS has employed in its NBAF site selection process was flawed from the beginning:* Competitive zeal caused the University of Georgia and the hastily assembled Georgia Consortium to offer DHS 66 acres of prime recreational land next to our State Botanical Garden without prior cautious review and consideration by them or DHS of the risks NBAF might represent to our environment and the quality-of-life in our community.

DHS is now examining the impact an NBAF would have on this extremely environmentally sensitive land (the South Milledge Ave. location in Athens next to our State Botanical Garden) that should never have been considered in the first place. The wrong-headed approach to NBAF site selection has fostered careless pandering by political and business gainseekers, and exaggeration of benefits and misrepresentation of risks by interested academic proponents (not a pretty picture) and a confused public. The process of misinformation being fed to our community by DHS and UGA has continued unabated for more than a year, aggravated by coyness, secrecy and pique when questions were raised. It took an investigation by Congress and the Government Accountability Office to bring public attention to the incorrect reasoning of DHS and the gravity of the risks DHS and its enablers are encouraging communities to assume.

4] 23.0

The DEIS does reveal previously withheld and startling information (an insect breeding facility "Insectary", for example) and candidly states that NBAF would be safest on Plum Island. But that hasn't ended the competition. And, typical of the NBAF process, the information most revealing of risk is minimized in a disingenuous "Executive Summary" and the hard details are hidden away in dense appendices. The disingenuousness of the whole NBAF site selection process has compromised the peace of our community and placed the public health, safety, economy and environment of our entire region subordinate to perceived economic benefit for the local proponents and the fallacious rational of DHS

5] 4.0

DHS, you have it backwards. *Instead of carrying out your mission to protect the people, for reasons yet to be fully explained or justified, you are encouraging the placement of NBAF in locations where affected communities and much of their economies would be forever at great risk— potentially catastrophic risk.*

6] 25.2

FAQinc "For Athens Quality-of-life", representing the views of a substantial majority of the informed citizens of Athens, Georgia and surrounding area, **vigorously objects to this perverse process.** *We do not want NBAF to be located in our*

Comment No: 3

Issue Code: 5.0

DHS notes the commentor's concern. As described in Section 2.3.1, DHS's site selection process incorporated site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. As such, some but not all of the sites selected for analysis as reasonable alternatives in the NBAF EIS are located in suburban or sem-urban areas. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

DHS held a competitive process to select potential sites for the proposed NBAF as described in Section 2.3.1 of the NBAF EIS. A multi-disciplinary team of engineers, scientists, lawyers, academics and communicators from the departments of Homeland Security, Agriculture, Health and Human Services, and Defense reviewed the submissions based primarily on environmental suitability and proximity to research capabilities, proximity to workforce, acquisition/construction/operations, and community acceptance. Ultimately, DHS identified five site alternatives that surpassed others in meeting the evaluation criteria and DHS preferences, and determined that they, in addition to the Plum Island Site, would be evaluated in the EIS as alternatives for the proposed NBAF.

Comment No: 4

Issue Code: 23.0

DHS notes the commentor's statement. As described in Section 2.2.1 of the NBAF EIS, supporting laboratory modules include insectary spaces necessary to support the research. The BSL-2 insectary is for the combined functions of breeding, rearing, manipulating, and holding/incubating of arthropod vectors used in the research programs. Other insectary research spaces within BSL-3E and BSL-3Ag would be used for holding infected live insects or arthropods and for virus transmission studies to and from both infected and non-infected large animals and small animals.

Comment No: 5

Issue Code: 4.0

DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives. The decision on whether to build the NBAF will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Comment No: 6

Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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MD0080

6 cont. | 25.2 | **community. The DEIS clearly shows that Plum Island would be the safest location**
7 | 5.1 | **for NBAF. To place it on South Milledge Avenue or anywhere in Athens would be**
a dangerous and irresponsible act.

Grady Thrasher and Kathy Prescott
for FAQinc. "For Athens Quality-of-life"
Athens, GA 30606
www.athensfaq.org

Comment No: 7 Issue Code: 5.1

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative in favor of the Plum Island Site Alternative.

Multiple Signatory Letter 54

Page 1 of 2

MD0061

August 25, 2008

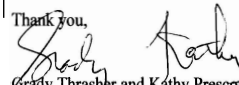
James V. Johnson
U. S. Department of Homeland Security
Science and Technology Directorate
Mail Stop #2100
245 Murray Lane SW
Building 410
Washington, DC 20528

Dear Mr. Johnson,

1| 27.0

Please include the enclosed USA Today newspaper article on the record of NBAF DEIS comments from Athens, GA.

Thank you,



Grady Thrasher and Kathy Prescott
for FAQinc: "For Athens Quality-of-life"
www.athensfaq.org

Comment No: 1

Issue Code: 27.0

DHS notes the information submitted by the commentors.

Multiple Signatory Letter 54

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MD0061

www.usatoday.com
SPORTS SCORES

A major charge for Harrington

British Open Winner Padraig Harrington rallies Sunday to take PGA Championship, 1, 8C

By Curtis Chin, AP

THE NATION'S NEWSPAPER
USA TODAY
NO. 1 IN THE USA

75 CENTS

Isaac Hayes
1942-2008
Death of a genuine soul man
Won Grammys, Oscar for Theme From Shaft, 7B
2008 photo by David J. Phillip, AP

Monday, August 11, 2008

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Across the nation

La. cockfight ban going into effect

Louisiana will become the last state to outlaw rooster fights on Friday, a move that enthusiasts say marks the end of a rich rural tradition.

"The culture, the custom of the Cajon people, it's gone," said Chris Dismick, who breeds fighting roosters in Larage, a community about 50 miles north of New Orleans.

Two-year-old Kathleen Blanco — a native of Cajon country, where the fights have deep roots — signed the ban last year, closing a loophole in state law that excluded chickens from animal cruelty laws.

In banning the fights, Louisiana reentered after years of pressure from the U.S. humane society and other animal-rights groups. The fights between trained birds remain legal on U.S. soil in Puerto Rico, American Samoa and Guam and are popular in Mexico, the Philippines and other countries.

Judge halts subway hacker presentation

A federal judge ordered three college students to cancel a Sunday presentation at a computer hackers' conference in Las Vegas showing security flaws in the automated fare system used by Boston's subway. U.S. District Judge Douglas Woodcock's temporary restraining order prevented Massachusetts Institute of Technology students from demonstrating at the Defcon conference how to take advantage of the system's vulnerabilities to get free rides.

The Electronic Frontier Foundation, which is representing MIT students Zack Anderson, RJ Ryan and Alessandro Chessa, plans to fight the order, said Jennifer Granick, the group's civil liberties director. Granick said the students planned to omit key information that would make things easier for anyone who wanted to hack the payment system.

Retrieval: Rescue workers try to remove a tractor-trailer from the Chesapeake Bay on Sunday

A tractor-trailer plunged off Maryland's scenic Bay Bridge, killing the driver and causing 10-mile backups in both spans of the bridge. The tractor-trailer fell over 30 feet into shallow water about 4 a.m., and two other people were seriously injured in the three-vehicle accident, said Maryland Transportation Authority spokesman Jonathan Green.

The 18-wheeler had been traveling west when the accident occurred. Mountain Farms, a poultry processing company in Seelyville, Del., owns the truck, said company spokesman Roger Marino. He said he did not know the driver's name or what the truck was hauling.

Recovery: ID work continues at crash site

Authorities worked to identify remains collected from the site of a helicopter crash in the Northern California wilderness as crews continued recovering bodies. Eight firefighters and a pilot perished in the crash. Bodies were taken to the Santa County coroner's office in Redding. DNA analysis and dental records will be used to identify the bodies. U.S. Forest Service spokesman Tim Knox said.

The helicopter was flying 10 firefighters, two pilots and a U.S. Forest Service employee back to base camp Tuesday when it crashed.

On deadline: What others are reporting

Divorcing spouses are reluctant roomies

Under the de-

know or should have known that scientist Bruce Hens, whom the Justice Department says carried out the attacks alone, was potentially dangerous, said Jonathan Turley, professor at the George Washington University Law School, who lawyers dispute the

known," Turley said. "It's like saying that you didn't know that a physician was a perfect lunatic at a hospital. The expectation is that a hospital would have sufficient monitoring to detect lunacy."

One lawsuit alleges that the gov-

most dangerous substances known to mankind," the Stevens family attorney Richard Schuler, said last week. Justice Department spokesman Charles Miller said, "There's nothing we can say. It's ongoing litigation."

Under the law that regulates suits to operate with unfettered access to these very lethal pathogens."

In June, the government reached a \$5.8 million settlement with Steven Hatfill, a scientist who was wrongly suspected in the case. Last week, the Justice Department disconnected him.

Tug of war over relocating lab

Five states grapple for financial and research boon, while residents rally against it

By Mimi Hall
USA TODAY

Kathy Prescott was scared when she heard about plans for a huge, new animal disease research lab in her hometown of Athens, Ga.

When she found out that Athens landed on the short list based in part because of her city's eagerness to host the government-run lab, she got angry.

"I said, 'Wait a minute, the community doesn't even know anything about it,'" says Prescott, an artist who has launched a campaign with her husband to keep the lab out of town. "We were sold down the river before anybody even knew what this thing was."

Five states are vying for the Department of Homeland Security's nearly \$500 million lab, which will study the world's deadliest and most contagious animal diseases.

The lab's current location is Plum Island, an off-island 840-acre government-owned land more than a mile off New York's shores.

Homeland Security says the lab is outdated and needs to be replaced with a facility that can develop vaccines and antibodies to some of the world's most exotic and dangerous foreign animal diseases. Such viruses, if released, could cause billions of dollars in damage to the economy and force the slaughter of untold numbers of cattle, sheep and pigs.

The worst of these diseases is known as foot-and-mouth disease, the world's last major outbreak occurred in Great Britain in 2001. It "appears that the undersecretary responsible for the program may have corrupted the site selection process by putting his thumb on the scale in favor of a particular Mississippi site in violation of his own rules and over the objections of his own advisors," said Rep. John Dingell, D-Mich., whose House Energy and Commerce Committee held oversight hearings in May examining the

High-tech, high-security: The storied Plum Island research facility currently sits about a mile east of New York's coast.

Site screening scrutinized

But some lawmakers are questioning the selection process.

An internal review conducted by a panel selected by Homeland Security officials rebuked the Mississippi site in Flora 14th out of 17 sites originally considered, according to documents obtained by the Associated Press.

Homeland Security Undersecretary Jay Cohen overruled the panel's low score and placed it in the top five.

"It appears that the undersecretary responsible for the program may have corrupted the site selection process by putting his thumb on the scale in favor of a particular Mississippi site in violation of his own rules and over the objections of his own advisors," said Rep. John Dingell, D-Mich., whose House Energy and Commerce Committee held oversight hearings in May examining the

partner's rules it was free to disregard the recommendations of the government experts it appointed. Homeland Security said it selected advisors who were experts and were screened carefully for any conflicts of interest, working through several stages of recommendations over 18 months.

A department spokeswoman, Amy Rodwin, said the agency's internal committee review "did not appropriately consider" certain implications in May examining the

island in the 1991 horror film "Press

Not in their backyards: Kathy Prescott and husband Grady Thresher stand near their group's billboard in Waldenville, Ga.

Plum Island Animal Disease Research Facility

Proposed lab, by the numbers

Name: National Bio and Agro-Defense Facility
Cost: \$500 million
Size: 2,000,000 square feet
Employees: Up to 150
Diseases that may be studied: foot-and-mouth, African swine fever, Japanese encephalitis, H5N1, Hanta virus.

Source: Department of Homeland Security

Visit usatoday.com for an interactive map of proposed sites

with Battle Memorial Institute, a Homeland Security contractor that already manages some national labs elsewhere.

Safety concerns

Critics say the lab is better situated on the island where highly contagious viruses can be easily spread.

The risk-reward ratio is something that needs to be discussed in more detail, says Republican congressional candidate RJ. Livon of North Carolina. "I'd be happy if it stayed offshore."

Plum Island has captured the imaginations of novelists and filmmakers over the years. Author Nelson Doubleday set his 1997 thriller of the same name on Plum Island. Clarence Starling tried to enter Hannibal Lecter with the

Silence of the Lambs.

Because it would cost more than \$750 million to build a new, more secure lab on Plum Island, Homeland Security began looking two years ago for less-expensive alternatives.

It now has whittled its list down to five sites: Athens, Ga.; Manhattan, Kan.; Flora, Miss.; San Antonio, Texas; and Fairfax, Va.

Elected leaders in all five states consider the lab a boon. It brings the promise of new construction, jobs, ties to research centers and more.

Last month, Kansas Gov. Kathleen Sebelius, a Democrat, called securing the National Bio and Agro-Defense facility her state's "top biodefense priority."

Homeland Security didn't keep its plans secret from community leaders — officials from Georgia to Kansas have been wooing the lab for more than a year.

Plum Island is still in the running as well, but Jamie Johnson of Homeland Security says a new lab could be built on the mainland for about \$500 million — and, he says, it would be cheaper to run a mainland lab year to year and easier to find top-notch workers who wouldn't have to commute by boat.

Homeland Security says it can build a safe secure lab.

"We can never say it's never going to happen," Johnson says. "But we can build a safe facility."

Contributing: The Associated Press

Multiple Signatory Letter 55

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MD0062

August 23, 2008

Mr. Johnson,

1| 27.0

Please include the enclosed DVD: "**NBAF TOWN HALL MEETING 2/19/08**"
as comments on the NBAF Draft Environmental Impact Statement For Athens GA.

Thank you,

Grady Thrasher
Kathy Prescott

Comment No: 1

Issue Code: 27.0

DHS notes the information submitted by the commentors.

Multiple Signatory Letter 56

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Congress of the United States

Washington, DC 20510

August 19, 2008

MD0054

Mr. James V. Johnson
U.S. Department of Homeland Security
Mail Stop #2100
245 Murray Lane, SW; Building 410
Washington, DC 20528

Dear Mr. Johnson:


We write today in united support for locating the National Bio and Agro-Defense Facility (NBAF) in Manhattan, Kansas.

As you know, the Kansas Congressional Delegation has gone on record throughout this process to support the efforts of our state and local leaders in competing for NBAF. We once again state our support and would like to associate ourselves with the comments our Kansas team has made on the accompanying pages. Kansas is not only the best place in the United States to host this site, it is no less than the best place in the world. Nowhere else do research, private enterprise, and local support for bioscience unite quite like in Kansas.

It is our unique understanding of bioscience and agro-defense that informs the comments in the following document. As you will read, there are several issues associated with the Draft Environmental Impact Statement (DEIS) that we would like to see addressed in the coming months. We echo our team's concerns, which include the DEIS' Foot and Mouth Disease analysis, the failure to include avian diseases in the modeling, building cost estimates, wind load issues, and the site evaluation itself.

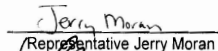
In following this issue closely, we have seen your team's work first hand and are very appreciative of the time and talent that has been devoted to this critical national priority. Should you choose Kansas to house NBAF, no less than our full resources will be devoted to our partnership now, and long into the future. Thank you in advance for your continued consideration.

Sincerely,



Senator Pat Roberts


Senator Sam Brownback


Representative Todd Tiahrt


Representative Jerry Moran


Representative Dennis Moore


Representative Nancy Boyda

Comment No: 1 Issue Code: 24.4

DHS notes the Senator's and Congressmen's support for the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 21.0

DHS notes the Senator's and Congressmen's concern that avian diseases are not included in the evaluations conducted in the NBAF EIS. The pathogens to be studied at the NBAF as provided in Chapter 2, Section 2.2.1 of the NBAF EIS include Foot and Mouth Disease virus, Classical Swine Fever virus, Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever virus. Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluate of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk assessment would be prepared and a separate NEPA evaluation may be required.

Comment No: 3 Issue Code: 23.0

See response to Comment No. 2.

Multiple Signatory Letter 57

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08/12/2008 15:20 FAX 202 224 1580

SENATOR CLINTON

MD0006

002

Congress of the United States

Washington, DC 20510

August 12, 2008

The Honorable Michael Chertoff
 Secretary
 United States Department of Homeland Security
 Washington, D.C. 20528

Dear Mr. Secretary:

We are writing to advocate for the continued operation of a Bio-Safety Level 3 (BSL-3) on Plum Island and to reiterate our strong opposition to placing a Bio-Safety Level 4 (BSL-4) facility at the Island.

- 1) 24.1 We are proud to support Plum Island's highly skilled, dedicated employees and their critically important mission of protecting this nation's food supply by stopping harmful pathogens before they enter the United States. The Plum Island Animal Disease Center has more than 300 employees, many who are Long Island residents. It has protected America's livestock from foreign animal diseases since 1954. Building on its impeccable record over the past decades, we believe it is important for Plum Island to continue conducting critical research and new discoveries as a BSL-3 facility. However, we continue to strongly oppose the construction of a new National Bio- and Agro- Defense Facility (NBAF) at Plum Island.
- 2) 25.1

Long Islanders will have the opportunity to voice their position on this subject at a meeting, sponsored by the DHS, scheduled for tonight – Tuesday, August 12, 2008. We expect the Department of Homeland Security to take full consideration of the views of the local community on the importance of Plum Island and how it continues to play a vital role in protecting our homeland.

We appreciate your attention to our concerns and look forward to working with you to preserve the integrity of our nation's food supply.

Sincerely,



Hillary Rodham Clinton
 United States Senator



Timothy Bishop
 Member of Congress

RECEIVED BY DHS EXEC SEC
 2008 AUG 12 PM 2:57

Comment No: 1

Issue Code: 24.1

DHS notes the Senator's and Congressman's support for PIADC at its current mission and opposition to upgrading it to include BSL-4 capabilities or siting the proposed NBAF on Plum Island. In order to bridge a capability gap in the nations' coordinated biodefense strategy and comply with the Homeland Security Presidential Directive 9, DHS proposes to build an integrated research, development, test and evaluation facility to address current and future biological and agricultural threats from natural and manmade sources. The purpose of the NBAF would be to develop tests to detect foreign animal and zoonotic diseases (transmitted from animals to humans) and develop vaccines (or other countermeasures such as antiviral therapies) to protect agriculture and food systems in the United States. The NBAF would enhance U.S. biodefense capabilities with modern and high-security (required BSL-3 and BSL-4) facilities that would ensure that we can safely address our vulnerability and counter risks from agro-terrorism.

PIADC does not have BSL-4 laboratory or animal space, and the existing PIADC facilities are inadequate to support a BSL-4 laboratory. Upgrading the existing facilities to allow PIADC to meet the NBAF mission would be more costly than building the NBAF on Plum Island, as discussed in Section 2.4.1 of the NBAF EIS.

The decision on whether or not the NBAF is built, and, if so, where will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Comment No: 2

Issue Code: 25.1

DHS notes the Senator's and Congressman's opposition to the Plum Island Site Alternative.

Multiple Signatory Letter 58

Page 1 of 1

WD0668

From: info@athensfaq.org on behalf of Kevin and Deanna McBurney [REDACTED]
Sent: Friday, August 22, 2008 5:52 PM
To: NBAFProgramManager
Subject: NBAF in Athens, Georgia

To: NBAF Evaluators at Homeland Security

Subject: Athens, Georgia Location

1|25.2; This is to notify you that we do not want the proposed Biolab to be located in Athens, Georgia.
2|19.2; The Athens location will be a double target for terrorism due to its close proximity to the CDC in Atlanta!
1Cont.|25.2 We are overwhelmingly against this and will vociferously fight it should Athens prove to be the location chosen.

Sincerely,

Kevin and Deanna McBurney

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 19.2

DHS notes the commentor's concern that the NBAF at the South Milledge Avenue Site would be a terrorist target. Section 3.14 and Appendix E of the NBAF EIS address accident scenarios, including external events such as a terrorist attack. A separate Threat and Risk Assessment (TRA) (designated as For Official Use Only) was developed outside of the EIS process in accordance with the requirements stipulated in federal regulations. The purpose of the TRA was to identify potential vulnerabilities and weaknesses associated with the NBAF and are used to recommend the most prudent measures to establish a reasonable level of risk for the security of operations of the NBAF and public safety. Because of the importance of the NBAF mission and the associated work with potential high-consequence biological pathogens, critical information related to the potential for adverse consequences as a result of intentional acts has been incorporated into the NEPA process.

Multiple Signatory Letter 59

Page 1 of 1

WD0688

From: Director, FAQinc [director@athensfaq.org]
Sent: Monday, August 25, 2008 10:05 AM
To: NBAFProgramManager
Cc: Grady, KP
Subject: AthensFAQ | For Athens Quality-of-life

Dear Mr. Johnson,

125.2 Please consider our entire website (link below) as a submitted COMMENT to be addressed in the NBAF FEIS. Most specifically, the existence of this website indicates that Athens, GA has not achieved and will never achieve COMMUNITY ACCEPTANCE.

<http://athensfaq.org/>

Respectfully submitted,

Kathy Prescott and Grady Thrasher
Co-Founders, FAQ, inc.
For Athens Quality-of-life

Comment No: 1 Issue Code: 25.2
DHS notes the commentor's request.

Multiple Signatory Letter 60

Page 1 of 3

CD1509

1) 25.2

NANCY ZECHIELLA

Dear Mr. Johnson,

Wee you please include the enclosed form with signature for opposition to siting the NBAF in Peters, LA.

Thank you for taking with me at your meeting in Petros. I have emailed additional questions.

Respectfully,
Nancy C. Zechiel

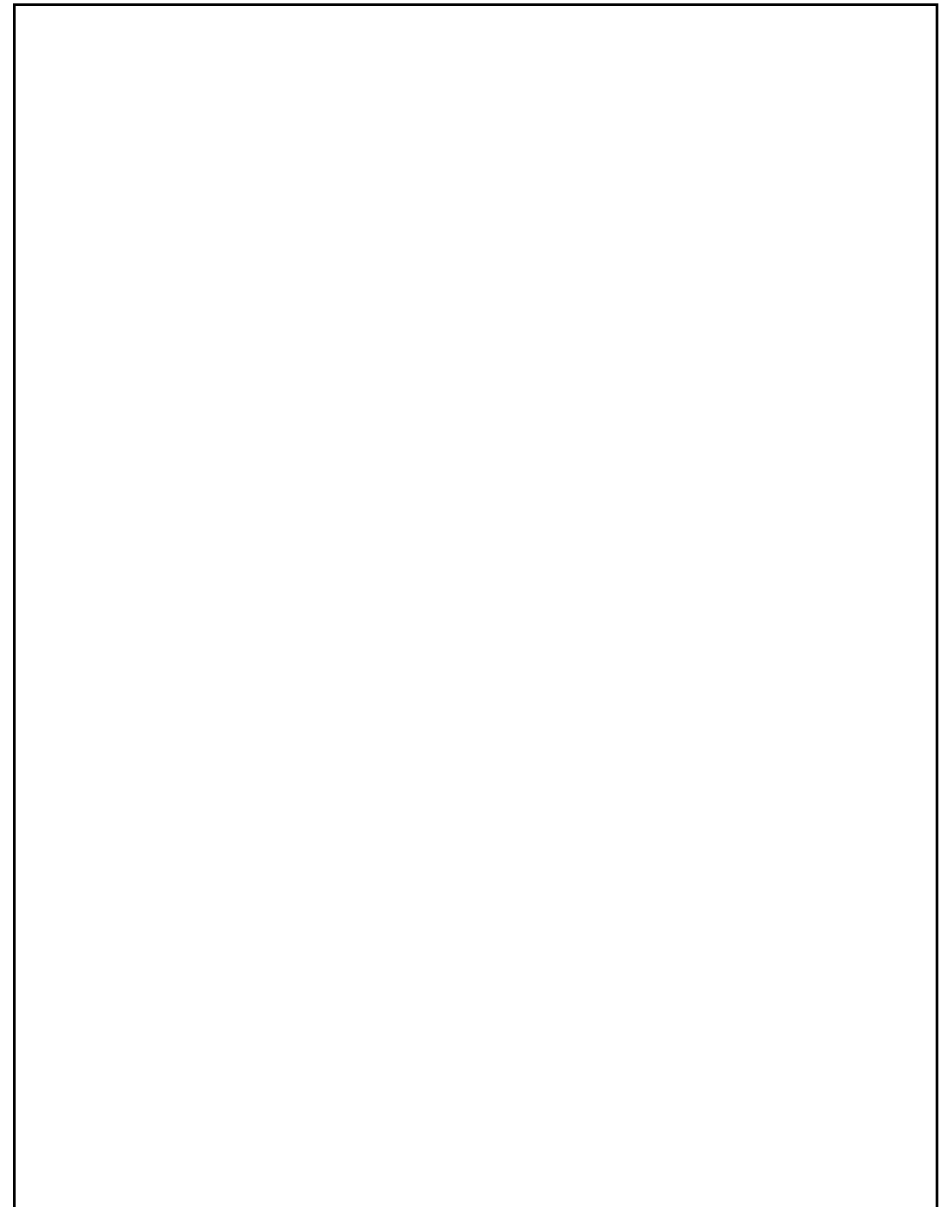
Comment No: 1

Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

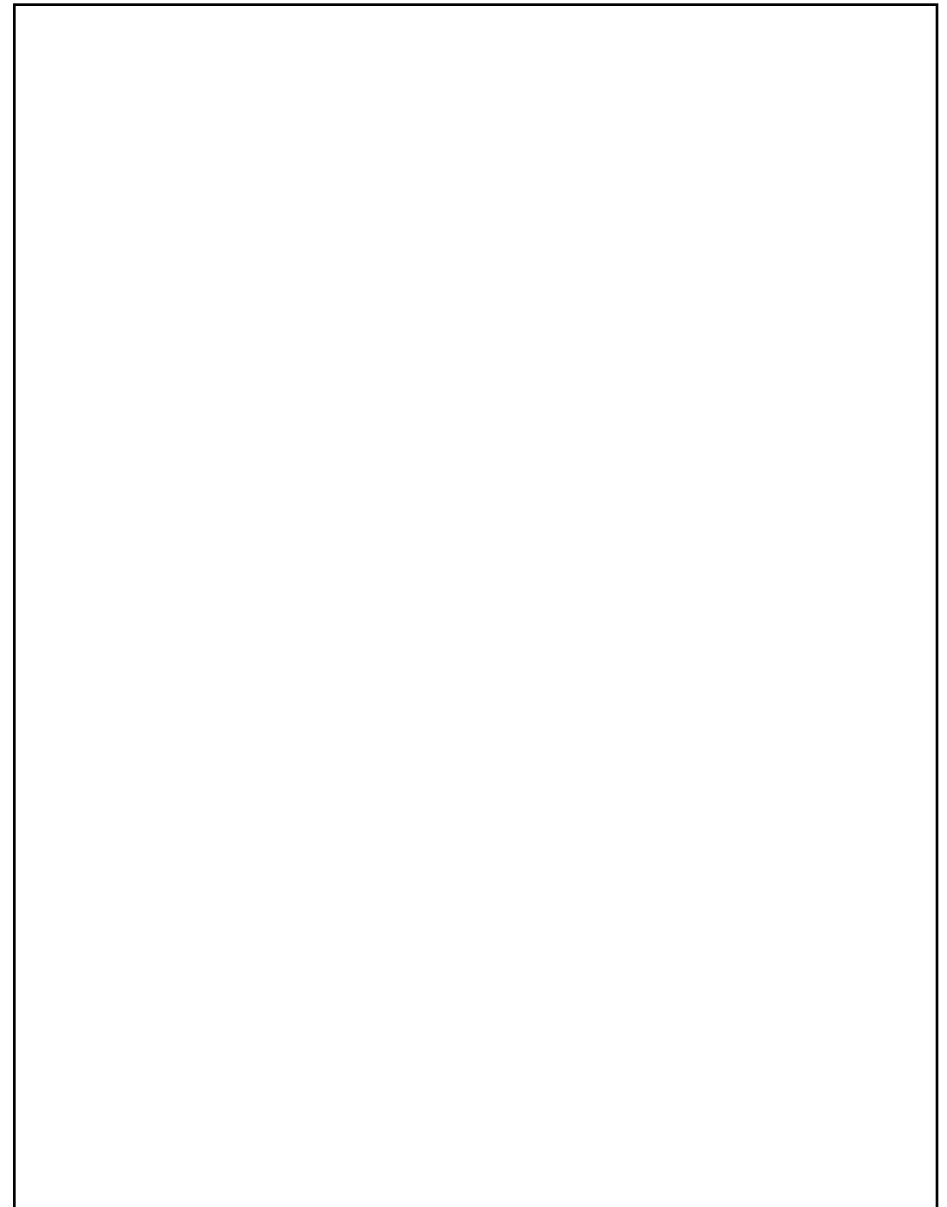
Multiple Signatory Letter 60

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Multiple Signatory Letter 60

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Multiple Signatory Letter 61

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WD0885

From: Grady Thrasher, III [REDACTED]
Sent: Sunday, July 20, 2008 8:38 AM
To: NBAFProgramManager
Subject: [REDACTED]
[REDACTED]

1) 27.0 | Please add to your scoping comments re NBAF DEIS the referenced opinion article published today in the Athens (GA) Banner-Herald.

Thank you,

Grady Thrasher and Kathy Prescott
[REDACTED] [REDACTED] GA
7/20/08

Comment No: 1 Issue Code: 27.0
DHS notes the information submitted by the commentors.